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April 29, 2001



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Scott Walker
Reports Analyst
Report Analysis Division
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Dear Mr. Walker,

I am responding to your memo dated April 18, 2001 regarding our 12 Day Pre-Primary Report (7/1/00-8/23/00).

In regard to the first item, the independent expenditures noted on Schedule E apply equally to <u>all</u> candidates listed on the addendum. You will note that there are seven candidates listed for whom the independent expenditures supported. There are three candidates for whom the independent expenditures opposed. Not all of the seven candidates that we supported had opponents but we did feature all seven candidates in our newsletter. Since this was done without their knowledge or the knowledge of their campaign, they qualify as independent expenditures and must be reported as such.

In regard to the second item, the Wisconsin Right to Life Political Action Committee (WRL/PAC) <u>hired</u> Life-Tel, Inc., a telemarketing firm that is a subsidiary of Wisconsin Right to Life to make fundraising calls. I Inadvertently reported that we paid \$25,351.25 to the Wisconsin Right to Life general fund. That was incorrect. I should have reported that \$25,351.25 was paid to Life-Tel, Inc., who charges WRL/PAC a rate per call that is based on fair market value.

Thank you for pointing out that we provided an incorrect identification number.

Sincerely,

Richard Fox Treasurer

WRL Board of Direction
Suspense D. Herro, President
Alan Kromer, Vice President
Thomas Corroll, Secretary
John J. Glinski, Treasurer
M. Susan Celentani
Allan Christianson
Barbara R. Niedermeler
Dan Pilon
Rom Rucinski

Delegate to National Right to Life Committee Out Rushishi

Executive Director

**Ranhara L. Ligani

Development Director

Many Philips

Legislative/PAC Director Syson Armacost

Legislative Logal Counsel Mary A. Maver

+- Education Director

Catherine Souknuda

Chapter Discolor Many Alee

Wisconsin Right to Life, Inc. 10625 W. North Ave., Suite LL Milweuher, WI 53226-2131

> IN: 414-778-578) Fax: 414-778-5785 Tall Free: 877-855-5007 Home Page: www.wrd.org

RECEIVED FEC MAIL ROOM







WASHINGTON, D.C. 20463

Richard J. Fox, Treasurer
Wisconsin Right to Life Political
Action Committee
10625 W North Avenue
Milwaukee, WI 53226



APR 1 B 2001

Identification Number:

C00173278

Reference:

12 Day Pre-Primary Report (7/1/00-8/23/00)

Dear Mr. Fox:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule E of your report indicates disbursements made in support of the federal candidates listed. However, the Addendum provided as a supplement to Schedule E indicates certain Independent Expenditures were made in opposition to Al Gore, Ron Kind, and David Obey. Please amend Schedule E to clarify this discrepancy. Also, please attribute an expenditure amount to each federal candidate if that amount is anything other than an equal division of the total amount spent.

-Schedule B of your report discloses a \$25,351.25 payment to your connected organization for fundraising (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Reports Analyst

Report Analysis Division

283

TEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

(Boo Plaverse Side for Instructions)

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CANDIDATES AFFECTED BY INDEPENDENT EXPENDITURES WISCONSIN RIGHT TO LIFE POLITICAL ACTION COMMITTEE WISCONSIN PRIMARY ELECTION - SEPTEMBER 12, 2000

<u>All</u> of the the independent expenditures reported on the pre-primary report affected the following candidates:

Supported by the independent expenditures:

George W. Bush - candidate for president

Mark Green - incumbent congressman - 8th CD

Paul Ryan - incumbent congressman - 1st CD

Thomas Petri - incumbent congressman - 6th CD

F. James Sensenbrenner, Jr., incumbent congressman - 9th-CD

Sean Cronin - candidate for congress - 7th CD

Susan Tully - candidate-for congress--3rd.CD

Opposed by the independent expenditures:

Al Gore - candidate for president

Ron Kind- incumbent congressman - 3rd CD

David Obey - incumbent congressman - 7th CD

SCHEDULE B

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Detailed Surrenary Page	FOR LINE N	JMBER

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ITEMIZED DISBURSEMENTS

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Temporal and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial contributions and committees.

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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	First Class Mail	POSTMARKED			
	Registered/Certified Mail	POSTMARKED (R/C)			
	No Postmark				
	Postmark Illegible				
	Received from the House office of Records and Registration	Date of Receipt			
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